

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

REGINALD ALAN DAVIS

Plaintiff,

v.

CITY OF MEMPHIS FIRE DEPARTMENT;
MAYOR A.C. WHARTON; ALVIN BENSON,
individually and in his official capacity as
Director of City of Memphis Fire Department;
SANDRA RICHARDS, individually and in her
official capacity; and DARYL PAYTON,
individually and in his official capacity,

Defendants.

No. 11-3076-STA-cgc

FILED IN OPEN COURT

DATE: 8-19-2013

TIME: 6:33 PM

INITIALS: J.H.

VERDICT FORM

Question Number 1: Has the City of Memphis shown by the preponderance of evidence that Mr. Davis, through his attorney, knowingly or recklessly made false statements regarding fire safety at Memphis International Airport and an alleged assault against him by Daryl Payton?

☒ Yes ☐ No (Mark an "X" in the appropriate spot)

If your answer to Question Number 1 is No, then proceed to Question Number 2. If your answer to Question Number 1 is Yes, then sign the verdict form and return it to the Court Security Officer.



Question Number 2: Has Mr. Davis shown that the City of Memphis took adverse action against him that would deter a person of ordinary firmness from continuing to engage in protected speech?

_____ Yes _____ No (Mark an "X" in the appropriate spot)

If your answer to Question Number 2 is Yes, then proceed to Question Number 3. If your answer to Question Number 2 is No, then sign the verdict form and return it to the Court Security Officer.

Question Number 3: Has Mr. Davis shown that the City of Memphis' decision to take adverse action against him was motivated at least in part by Mr. Davis' statements regarding fire safety at Memphis International Airport?

_____ Yes _____ No (Mark an "X" in the appropriate spot)

If your answer to Question Number 3 is Yes, then proceed to Question Number 4. If your answer to Question Number 3 is No, then sign the verdict form and return it to the Court Security Officer.

Question Number 4: Did the City of Memphis show, by the preponderance of evidence, that it would have terminated Mr. Davis even had neither he nor his attorney made statements regarding fire safety at Memphis International Airport?

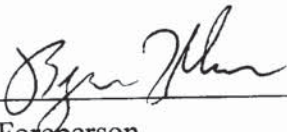
_____ Yes _____ No (Mark an "X" in the appropriate spot)

If your answer to Question Number 4 is No, then proceed to Damages. If your answer to Question Number 4 is Yes, then sign the verdict form and return it to the Court Security Officer.

Damages

We find plaintiff Reginald Alan Davis' damages as defined in the instructions for general damages, compensatory damages, and nominal damages to be:

\$_____ (stating the amount, or if you find that the plaintiff's damages have no monetary value, set forth a nominal amount such as \$1.00)



Jury Foreperson

Date: 8/19/13